

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

2023 JUN -8 PM 3:11

CLERK

UNITED STATES OF AMERICA

v.

JERRY BANKS

)  
)  
)  
)  
)

No. 5:22-cr-58

BY *File*  
DEPUTY CLERK

SUPERSEDING INFORMATION

The United States Attorney charges:

Count One

Between in or about May 2017 and in or about February 2018, within the District of Vermont and elsewhere, the defendant, JERRY BANKS, knowingly and willingly traveled in interstate commerce, and used and caused others to use facilities of interstate commerce, namely cellular telephone networks, with intent that the murder of Gregory Davis be committed, in violation of 18 U.S.C. § 2384, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value.

(18 U.S.C. § 2384)

## Count Two

Between in or about the fall of 2017 and in or about January 2018, in the District of Vermont and elsewhere, the defendant, JERRY BANKS, knowingly and willfully conspired with Aron Lee Ethridge, Berk Eratay, Serhat Gumrukcu, and others known and unknown, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away for reward and otherwise Gregory Davis, when BANKS travelled in interstate commerce and both BANKS and ETHRIDGE used a facility or instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, resulting in Davis's death.

### *Overt Acts*

In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the District of Vermont and elsewhere:

- a. Before the fall of 2017, Eratay contacted Ethridge requesting that Ethridge assist Eratay in the killing of Gregory Davis. Eratay told Ethridge that Eratay was acting on behalf of Gumrukcu, that Gumrukcu was providing the funds, and that Gumrukcu had a business dispute with Davis. Ethridge later enlisted BANKS as the hit man.
- b. In or about the fall of 2017, Eratay paid Ethridge over \$100,000 in cash received from Gumrukcu both as payment for and to cover expenses for the murder, approximately half of which would eventually go to BANKS.
- c. In or about the fall of 2017, Eratay provided Ethridge with identifying and location information for Davis, including his photograph, which Ethridge provided to BANKS.
- d. In or about November 2017, BANKS travelled from Colorado to Vermont and conducted surveillance on Davis's residence. After the surveillance trip, BANKS informed

Ethridge that the murder plan would have to be adjusted, as Davis would likely need to be abducted from the property prior to being murdered. Ethridge told Eratay about this development. BANKS told Ethridge that he planned to impersonate law enforcement as part of the abduction.

e. In or about January of 2018, BANKS travelled from Colorado to Vermont to kidnap and kill Davis.

f. On or about January 5, 2018, BANKS purchased a prepaid phone at a Walmart in Clearfield, Pennsylvania.

g. On or about January 6, 2018, BANKS used the prepaid phone purchased from the Clearfield Walmart to call 911 and report a fictitious shooting.

h. On or about January 6, 2018, BANKS knocked on the door of Gregory Davis's home dressed in a manner imitating a U.S. Marshal and claimed to have an arrest warrant for Davis.

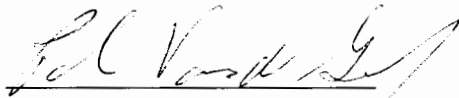
i. On January 7, 2018, BANKS called Ethridge to inform him that Davis had been successfully kidnapped and murdered.

(18 U.S.C. § 1201(c))

Count Three

On or about February 27, 2018, in the District of Colorado, defendant JERRY BANKS knowingly engaged in a monetary transaction in criminally derived property of a value greater than \$10,000, that was derived from specified unlawful activity, to wit: BANKS committed murder-for-hire as charged in Count One, and thereafter exchanged approximately \$25,200 of the proceeds of that crime for a 2001 Chevrolet Corvette, which BANKS purchased from a car dealership in Longmont, Colorado.

(18 U.S.C. § 1957)

  
NIKOLAS P. KEREST (PJV/JAO)  
United States Attorney  
Burlington, Vermont  
June 8, 2023